

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA, *ex rel.*
DILBAGH SINGH, M.D.,
PAUL KIRSCH, M.D.,
V. RAO NADELLA, M.D., and
MARTIN JACOBS, M.D.,**

Relators,

V.

Civil Action No. 04-186E

**BRADFORD REGIONAL
MEDICAL CENTER,
V & S MEDICAL ASSOCIATES, LLC,
PETER VACCARO, M.D.,
KAMRAN SALEH, M.D.,
and DOES I through XX,**

Defendants.

PROPOSED ORDER

Upon consideration of the Defendants' joint motion and supporting brief for an order compelling the Relators to answer certain categories of questions propounded to them at their depositions, and it appearing that the categories of questions are relevant to the subject matter of the action and should have been answered by the Relators, it is ORDERED as follows:

1. Each Relator shall reappear before the officer taking their depositions, at such time and place as the Defendants shall designate on 10 days' notice, and then and there answer under oath questions dealing with the following subjects: (a) Relators' patient referrals and referral patterns and practices, (b) non-compete agreements to which Relators have

been a party, (c) the Statement of Material Evidence filed with the United States under 31 U.S.C. § 3730(b)(2) in connection with this case, and (d) issues dealing with Relators' motivations in filing this action. The Relators are directed to answer questions including, but not limited to, those questions dealing with these subjects that were previously asked of them during their initial depositions, but which they refused to answer, as well as such other questions as may be related thereto or to said subjects.

2. Relators shall produce to Defendants a copy of the Statement of Material Evidence filed with the United States under 31 U.S.C. § 3730(b)(2) in connection with this case within 10 days following the entry of this order.
3. Relators shall pay the Defendants their reasonable expenses and attorneys' fees related to obtaining this order, pursuant to Federal Rule of Civil Procedure 37(a)(4)(A).

Dated: September __, 2007

Maurice B. Cohill
United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date he served the following with a copy of the foregoing Proposed Order by e-mail via the Court's ECF system and by first class United States mail, addressed as follows:

Andrew M. Stone
Allegheny Building, Suite 1400
429 Grant Street
Pittsburgh, PA 15219

G. Mark Simpson
Simpson Law Firm, LLC
165 North Main Street
Jonesboro, GA 30236

Paul E. Skirtich
Assistant U.S. Attorney
Western District of PA
U.S. Post Office & Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219

This 4th day of September 2007.

/s/ Daniel M. Mulholland III
Daniel M. Mulholland III, Esquire